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Attorneys for Defendants
TATA AMERICA INTERNATIONAL
CORPORATION, TATA CONSULTANCY
SERVICES, LTD. and TATA SONS, LTD.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

GOPI VEDACHALAM and KANGANA
BERI, on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

TATA AMERICA INTERNATIONAL
CORPORATION, a New York corporation;
TATA CONSULTANCY SERVICES, LTD.,
an Indian corporation; and TATA SONS,
LTD., an Indian corporation,

Defendants.

Case No. 06 CIV 963 (VRW)

**STIPULATION AND ORDER
EXTENDING DEFENDANTS' TIME TO
RESPOND TO FIRST AMENDED
COMPLAINT**

[N.D. Local Rule 6-1]

1 Pursuant to Rule 6-1 of this Court's Civil Local Rules, Plaintiffs Gopi Vedachalam and
2 Kangana Beri, and defendants Tata America International Corporation, Tata Consultancy
3 Services, Ltd. and Tata Sons, Ltd. (collectively "Defendants"), by and amongst themselves, hereby
4 stipulate as follows:

5 Defendants' time to respond to the First Amended Complaint in the above-captioned
6 matter shall be extended by an additional 29 days (from June 15, 2006 to July 14, 2006).
7 Defendants have received no prior extensions of their time to respond to the First Amended
8 Complaint.

9 The parties further acknowledge that Defendants' motion to dismiss the original complaint
10 in this matter is withdrawn without prejudice and is taken off calendar. However, Defendants'
11 motion to compel arbitration and to

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1 dismiss, or alternatively, to stay the action shall remain on calendar (for hearing on July 13, 2006
2 as previously noticed).

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4 Dated: June 9, 2006

LOEB & LOEB LLP

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7 By: /s/ Michelle M. La Mar

Michelle M. La Mar
Attorneys for Defendants
TATA AMERICA INTERNATIONAL
CORPORATION; TATA CONSULTANCY
SERVICES, LTD.; and TATA SONS, LTD

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11 Dated: June 9, 2006

KELLEY DRYE & WARREN LLP

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13 By: /s/ Kevin J. Smith

Kevin J. Smith
Attorneys for Defendants
TATA AMERICA INTERNATIONAL
CORPORATION; TATA CONSULTANCY
SERVICES, LTD.; and TATA SONS, LTD

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18 Dated: June 9, 2006

LEIFF, CABRASER, HEIMANN &
BERNSTEIN, LLP

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21 By: /s/ Steven M. Tindall by PEL w/permission

Steven M. Tindall
Attorneys for Plaintiffs
GOPI VEDACHALAM and KANGANA
BERI, on behalf of themselves and others
similarly situated

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25 **IT IS SO ORDERED.**

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27 Dated: 6/9/2006

